

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

EXHIBIT  
V

TRACEY WHITE, et al., )  
                          )  
Plaintiffs,            )  
                          )  
vs.                    ) Cause No. 14-cv-01490-HEA  
                          )  
THOMAS JACKSON, et al., )  
                          )  
Defendants.            )

DEPOSITION OF RICHARD MUNDY

Taken on behalf of the Plaintiffs

October 26, 2015

Reported by: Christine A. LePage, CCR #1000

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1 Q Okay. You were somewhere else?

2 A I know I was down by the burnt out QuikTrip.

3 Q Okay. Now, on the 11th, there was an arrest of  
4 two gentlemen, Theophilus Green and Damon Coleman, this  
5 occurred in a parking lot, and I can show you a video to  
6 refresh your recollection, but my question is going to be  
7 were you involved in that?

8 A Those names do not sound familiar to me.

9 Q Okay.

10 A Because on the 11th we would have been the  
11 arrest team for the St. Louis Metropolitan police  
12 department, their SWAT team.

13 Q Yes.

14 A And I don't remember, and, again, effecting  
15 arrests on them.

16 Q Okay. You were asked some questions about Chief  
17 Tom Jackson. You understand that at the time he was the  
18 chief of the City of Ferguson, correct?

19 A Yes, he was.

20 Q You also understand that as of the 11th and the  
21 13th, the control of that region and the policing of that  
22 region was turned over to St. Louis County, correct?

23 A Yes.

24 Q And you also took your orders from your  
25 superiors within St. Louis County, correct?

1 A Yes.

2 Q Did you take any orders from Chief Tom Jackson  
3 at that point?

4 A Honestly, I never saw Chief Jackson, so whatever  
5 command orders were given trickled down to us.

6 Q Okay. Now, he's named as a defendant in this  
7 lawsuit, I'll represent to you. So my question is did you  
8 ever hear about any involvement at all of Chief Tom  
9 Jackson regarding the several plaintiffs that Mr. Lattimer  
10 named off earlier?

11 A As far as me personally seeing Chief Jackson?

12 Q Yes.

13 A No, sir, I did not.

14 Q Okay. You ever heard of Justin Cosma, Officer  
15 Justin Cosma?

16 A I don't know Justin Cosma.

17 Q Okay. Now, with respect to the City of  
18 Ferguson, when you were conducting arrests or involved in  
19 any arrests, you were arresting on either St. Louis County  
20 ordinances or state statutes, correct?

21 A Yes.

22 Q Did you ever review the training policies or the  
23 general orders of the City of Ferguson?

24 A I did not personally, no.

25 Q Okay. In other words, when you were conducting

1 your behavior, it wasn't to comply with the City of  
2 Ferguson's general orders, was it?

3 A No, it was -- Well, our use of force policies,  
4 every policy that we have at St. Louis County we  
5 represented during this incident, and we basically used  
6 state charges, and I know -- I think we went -- I don't  
7 know if we went to the County counselor on some issues or  
8 not. Actually, no, that was another -- I'm sorry. It was  
9 the state charges.

10 Q In other words, you were complying with your  
11 internal St. Louis County's?

12 A Yes.

13 Q Okay. And you weren't aware of what City of  
14 Ferguson's may have said, right?

15 A No, I was not.

16 Q Okay. That's all I have. Thank you very much.

17 MS. GUNN: So you want to waive signature?

18 THE WITNESS: (Witness nods.)

19 MS. GUNN: Okay. We'll waive signature.

20 \*

21 \*

22 BY AGREEMENT OF COUNSEL AND WITH CONSENT OF THE WITNESS

23 THE SIGNATURE IS HEREBY WAIVED.

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